

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CARL LOWE and JACOB DUFFEE, on behalf of themselves and others similarly situated,	)	
	)	Case No. 1:12-cv-02009
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
DIVERSIFIED CONSULTANTS, INC., a Florida corporation,	)	Hon. Judge Thomas M. Durkin
	)	Hon. Mag. Judge Young B. Kim
	)	
Defendant.	)	

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MALINDA DE JESUS, on behalf of plaintiff and the class defined below,	)	
	)	Case No. 1:12-cv-02443
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
DIVERSIFIED CONSULTANTS, INC.,	)	Hon. Judge Thomas M. Durkin
	)	Hon. Mag. Judge Young B. Kim
	)	
Defendant.	)	

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL EXHIBIT IN SUPPORT OF MOTION  
TO COMPEL (DKT. NO. 56)**

Plaintiffs Carl Lowe, Jacob Duffee, and Malinda De Jesus submit the following Notice of Supplemental Exhibit in Support of their Motion to Compel (Dkt. No. 56). Plaintiff's Motion to Compel is set for a continued hearing, today, April 5, 2013 at 11:00am.

Attached hereto as Exhibit 1, is the Affidavit of Micahel C. Leraris, which was produced by LiveVox, the dialer admittedly used by Defendant Diversified Consultants, Inc. ("DCI"), in a similar lawsuit against DCI alleging violations of the TCPA: *Reid v. Diversified Consultants*,

*Inc.*, 3:12-cv-1288-TMB (M.D.Pa.). DCI is represented by the same counsel in *Reid* as in this case.

The affidavit, dated February 14, 2013, is responsive to plaintiff's first requests for production, number 10 [docket item 56-3, p. 12] asking for a "copy of any testimony relating to your dialers [including] declarations, and affidavits." This affidavit was serendipitously and recently obtained by plaintiff's counsel, from counsel for the plaintiff in *Reid*. It has never been disclosed by DCI.

This declaration establishes that the hosted LiveVox dialer used by DCI is an Automatic Telephone Dialing System ("ATDS") under the TCPA, because it has the capacity to dial numbers without human intervention. See *In re Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, 23 FCC Rcd 559, 566-67, ¶¶12-14 (Jan. 4, 2008).

WHEREFORE, Plaintiffs, in support of their previously filed Motion to Compel (Dkt. No. 56) respectfully request that the Court enter an order compelling DCI to respond to discovery.

Respectfully submitted,

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*Counsel for Plaintiffs Lowe and Duffee*

**AFFIDAVIT OF MICHAEL C. LERARIS**

NOW COMES the affiant, Michael C. Leraris, being first duly sworn upon oath under the penalty of perjury under the laws of the State of California, and testifies that the following is true and correct to the best of his knowledge and belief.

1. I am the Chief Financial Officer and Executive Vice President for Operations for LiveVox, Inc. (“LiveVox”), and have been employed at LiveVox in this position since July 2007. I am competent and authorized to testify to the matters set forth herein and have personal knowledge of the facts stated herein.
2. As the Chief Financial Officer and Executive Vice President for Operations, my responsibilities include assisting with the oversight of all aspects of LiveVox’s dialing activities on behalf of its customers. In order to provide proper oversight, it is necessary to understand the operational aspects of how the LiveVox platform works, as well as each of the individual costs and risks associated with providing the service.
3. LiveVox is a vendor that provides, in part, information systems, including telephone dialing solutions, to its clients.
4. LiveVox uses its own proprietary dialing software (the “LiveVox Hosted System”) to provide telephone dialing solutions to Diversified Consultants,

Inc. (“DCI”). DCI has been a LiveVox customer since approximately August 1, 2009.

5. The LiveVox Hosted System is a dialing solution, consisting of both software and hardware, that is programmed to dial telephone numbers from a database of information, which includes telephone numbers, provided by its customers, such as DCI. The System stores the specific information, which includes telephone numbers, that is supplied by its customers and will call only those telephone numbers that are within the database of information provided by LiveVox’s customers.
6. LiveVox provides DCI with access to the LiveVox Hosted System to make telephone calls.
7. The LiveVox Hosted System dials numbers from the database of information provided in a logical sequence. The logic includes but is not limited to such factors as the time zone of the party to be called, the number of previous attempts, the first name of the party to be called, or the order in which the customer provided the telephone numbers to LiveVox. LiveVox’s customers may select the logic that they would like employed to dial such numbers.
8. The LiveVox Hosted System is capable of operating in different modes. In some modes, it dials numbers without human intervention. In other modes (such as manual dial, or dynamic preview dial), human intervention is required. LiveVox’s customers choose which mode or modes they use.

9. As a *predictive* dialer, the LiveVox Hosted System uses computer algorithms and software to attempt to *predict* when an agent will be available to take a telephone call, based on several factors which can be modified by LiveVox's customers.
10. When operating as a predictive dialer, the LiveVox Hosted System sometimes dials numbers automatically and without human intervention, and sometimes human intervention is required, depending on the dialing mode selected by the customer.
11. LiveVox reviewed its records for all calls made on behalf of DCI to telephone number 570-████-2681 from December 21, 2010 through and including December 19, 2012. Attached and incorporated as Exhibit A are the call results from that time period, reflecting that calls were made under the above criteria between January 14, 2012 and June 5, 2012.
12. Exhibit A reflects that seventy-seven (77) calls were made between DCI and telephone number 570-████-2681. Of these, two calls were inbound calls from telephone number 570-████-2681 (on May 15 at 5:15 pm, and June 5), the remaining seventy-five (75) were outbound calls to telephone number 570-████-2681. Of the seventy-five outbound calls, seventy-three (73) were made in a predictive dialing mode; two were made in a manual dialing mode. The two calls made in a manual mode were on March 13 at 12:14 pm and May 2 at 9:38 am.

13. For all seventy-seven (77) calls reflected on Exhibit A, except for six (6) calls that were made on January 14, March 13 at 12:14 p.m., May 2 at 9:38 a.m., May 8, May 15 at 5:15 p.m., and June 5, LiveVox's records reflect that the calls were made on behalf of DCI using Template number 11788, which is attached and incorporated as Exhibit B.
14. From December 21, 2010 through and including December 19, 2012, DCI utilized the LiveVox Hosted System to place seventy-one (71) phone calls to 570-████-2681 using Template number 11788.
15. Template 11788 contains a series of prerecorded statements beginning with the "ID Sequence Phrase." For example, if during the "ID Sequence Phrase" the LiveVox system detects an answering machine, it will either leave an "Answering Machine Message" as described, or hang up, depending on how the customer has configured its settings. Additionally, if the called party presses "1", a prerecorded statement plays saying "Your call may be monitored or recorded for quality assurance purposes." Then a connection will be attempted between the called party and a live DCI agent. All of the messages reflected in Template 11788 are prerecorded statements. Only when there is a successful "Operator Transfer" does the called party speak to a live DCI agent. Template 11788 is designed so that the called party hears at least one prerecorded message before speaking to a live agent. The template attached as Exhibit B reflects the full call flow handling for template 11788.

16. LiveVox is unaware of any information indicating that Template 11788 did not work as designed with respect to the calls reflected on Exhibit A.
17. Exhibit A reflects that DCI also placed two (2) calls on the LiveVox Hosted System to telephone number 570-██████2681 using Template 7252, which is a template that utilizes the predictive mode. Except for uploading the relevant account information, no specific human intervention is required to place a particular call using Template 7252 on the LiveVox Hosted System. Template 7252 is designed so that a human being is not available to speak to the called party until the call has been successfully connected to a live person at the recipient's telephone number. The template attached as Exhibit C reflects the full call flow handling for Template 7252.
18. LiveVox is unaware of any information indicating that Template 7252 did not work as designed with respect to the calls reflected on Exhibit A.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
Michael C. Leraris 2/14/2013

# EXHIBIT A

Summary											
Client DCI											
Phone Number 570872681											
Start Date 12/21/2011											
End Date 12/19/2012											
Results		Call Center	Name	Account	Agent	Date	Start	End	Campaign	Caller ID	Outcome
DCI Jacksonville	25223_Training-QC (7)	Mary Reid	12060388			Sat Jan 14 2012	9:15:37 AM	9:16:14 AM	master_inums_file_test_01-14-2011_vb12_qc.csv	8773040465	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Mon Jan 16 2012	7:26:35 PM	7:27:08 PM	2011_vd1_qc.csv.r1	2674436465	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Tue Jan 17 2012	6:44:22 PM	6:44:58 PM	master_inums_file_test_01-17-2011_vd66_qc.csv	2674436467	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Sat Feb 11 2012	9:42:35 AM	9:42:35 AM	master_inums_file_test_02-11-2012_verz_0-30_qc.csv	2674436474	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Tue Feb 14 2012	9:08:18 AM	9:08:53 AM	2012_nemw_og_qc.csv	2674436474	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Wed Feb 15 2012	10:45:14 AM	10:45:27 AM	master_inums_file_test_02-15-2012_hugh_qc.csv	2674436465	No Answer
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Tue Feb 21 2012	2:20:03 PM	2:20:29 PM	2012__verz_nemw_og.csv	2674436465	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	C088		Wed Feb 29 2012	9:13:22 AM	9:15:55 AM	master_inums_file_test_02-29-2012_hugh.csv	2674436474	AGENT - CUST 1
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Fri Mar 02 2012	9:06:07 AM	9:06:37 AM	master_inums_file_test_03-2-2012_verz_fri_og.csv	2674436467	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Fri Mar 02 2012	3:52:15 PM	3:52:51 PM	2012__verz_fri_og.csv.r1	2674436467	No Answer
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Wed Mar 07 2012	9:06:39 AM	9:07:16 AM	master_inums_file_test_03-7-2012_verizon_hugh.csv	2674436465	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Thu Mar 08 2012	1:18:19 PM	1:18:55 PM	master_inums_file_test_03-8-2012__verz_nemw_og.csv	2674436467	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Fri Mar 09 2012	9:07:56 AM	9:08:20 AM	2012__verz_nemw_og.csv	2674436474	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Mon Mar 12 2012	7:17:37 PM	7:18:13 PM	master_inums_file_test_03-12-2012__verz_hugh.csv	2674436474	No Answer
DCI Jacksonville	26829_Verizon-Manual Blended (24)	Mary Reid	12060388	C243		Tue Mar 13 2012	12:14:52 PM	12:16:03 PM	26829_MANUAL_CALLBACK_CALLS_03-13-2012.bt	2674436465	AGENT - Left Message Machine
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Tue Mar 13 2012	1:26:05 PM	1:26:25 PM	master_inums_file_test_03-13-2012__verz_hugh.csv	2674436465	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Wed Mar 14 2012	9:11:16 AM	9:11:35 AM	2012__verz_hugh.csv	2674436467	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Thu Mar 15 2012	1:20:36 PM	1:21:08 PM	master_inums_file_test_03-15-2012__verz_nemw_og.csv	2674436474	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Fri Mar 16 2012	9:06:30 AM	9:06:54 AM	master_inums_file_test_03-16-2012__verz_og_fri.csv	2674436465	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Fri Mar 16 2012	2:04:42 PM	2:04:59 PM	master_inums_file_test_03-16-2012__verz_og_fri.csv.r1	2674436465	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Sat Mar 17 2012	9:41:54 AM	9:42:31 AM	master_inums_file_test_03-17-2012__verz_sat.csv	2674436467	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Mon Mar 19 2012	6:36:33 PM	6:38:51 PM	2012__verz_hugh.csv	2674436465	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Tue Mar 20 2012	7:51:55 PM	7:52:29 PM	master_inums_file_test_03-20-2012__verz_nemw_og.csv	2674436467	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Wed Mar 21 2012	9:12:19 AM	9:12:34 AM	2012__verz_hugh.csv	2674436474	Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388			Thu Mar 22 2012	9:03:13 AM	9:03:46 AM	2012__verz_hugh_am_ogl.csv	2674436465	Answering Machine (Hung Up)

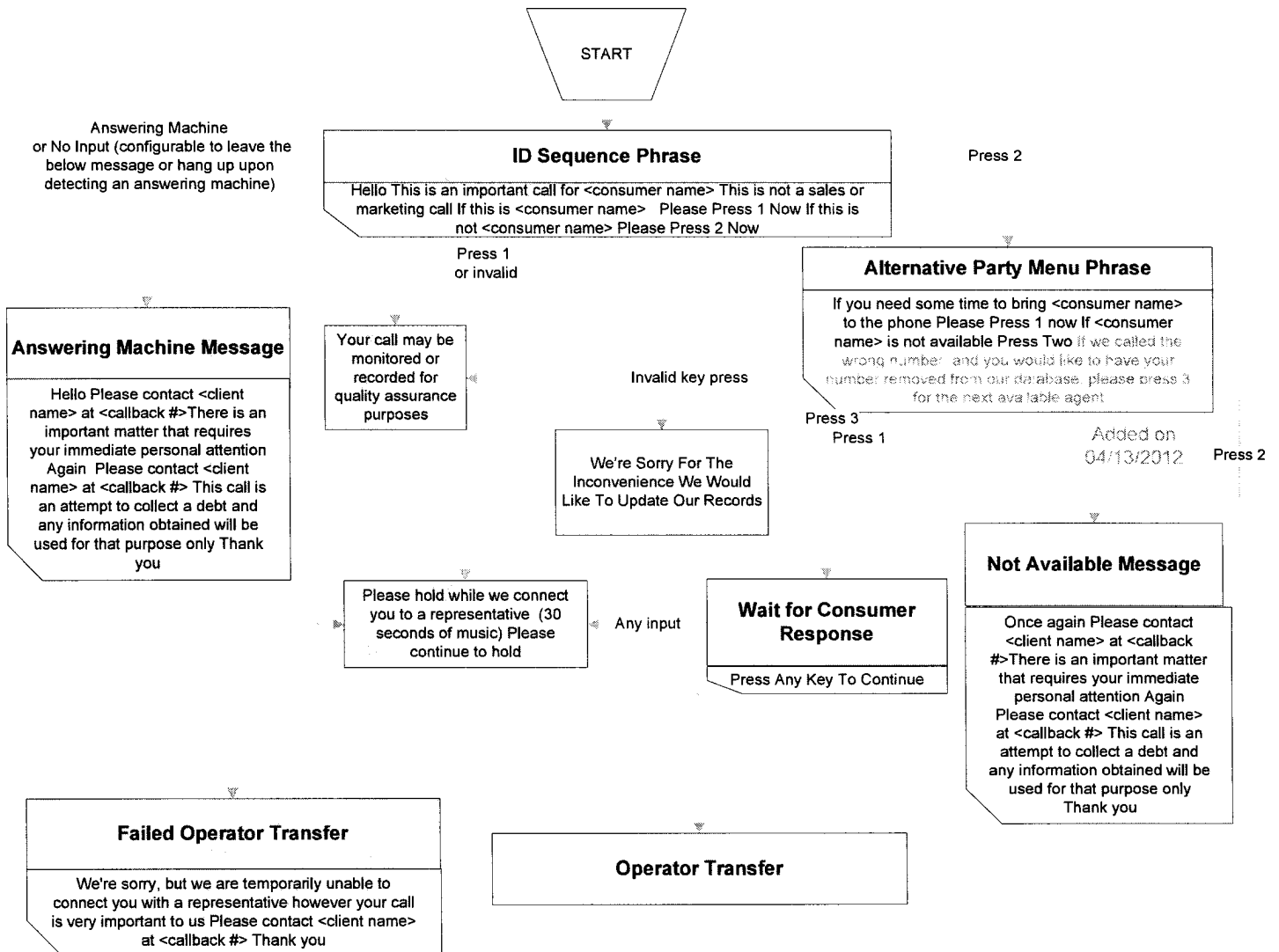
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Fri Mar 23 2012	9:07:15 AM	9:07:33 AM	master_inums_file_test_03-23-2012_verz_friday_og.csv	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Fri Mar 23 2012	3:56:43 PM	3:57:03 PM	master_inums_file_test_03-23-2012_verz_friday_og.csv	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Sat Mar 24 2012	9:06:51 AM	9:07:26 AM	master_inums_file_test_03-24-2012_verz_sat.csv	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Sat Mar 24 2012	11:45:15 AM	11:45:35 AM	master_inums_file_test_03-24-2012_verz_sat.csv	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon Mar 26 2012	7:22:45 PM	7:23:06 PM	master_inums_file_test_03-26-2012_verz_hugh.csv	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Tue Mar 27 2012	9:00:51 AM	9:01:21 AM	master_inums_file_test_03-27-2012_verizon_friday_og.csv	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Tue Mar 27 2012	2:07:19 PM	2:07:26 PM	master_inums_file_test_03-27-2012_verizon_friday_og.csv	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Wed Mar 28 2012	9:02:18 AM	9:02:56 AM	master_inums_file_test_03-28-2012_verizon_hugh.csv	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Thu Mar 29 2012	1:23:19 PM	1:23:59 PM	master_inums_file_test_03-29-2012_verz_nemw_og.csv	2674436467 Hung Up in Opening
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Fri Mar 30 2012	9:01:29 AM	9:02:04 AM	master_inums_file_test_03-30-2012_verizon_friday_og.csv	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Fri Mar 30 2012	4:07:35 PM	4:07:51 PM	master_inums_file_test_03-30-2012_verizon_friday_og.csv	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Sat Mar 31 2012	9:11:26 AM	9:11:58 AM	master_inums_file_test_03-31-2012_verz_0-30.csv	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon Apr 02 2012	6:09:52 PM	6:10:27 PM	master_inums_file_test_04-2-2012_verz_hugh_og_wk1.csv	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Tue Apr 03 2012	1:02:47 PM	1:03:24 PM	master_inums_file_test_04-3-2012_verz_nemw_og.csv	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Thu Apr 05 2012	9:00:02 AM	9:00:37 AM	master_inums_file_test_04-5-2012_verz_hugh_og_wk1.csv	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Fri Apr 06 2012	9:00:47 AM	9:01:23 AM	master_inums_file_test_04-6-2012_verizon_fri.csv	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Fri Apr 06 2012	3:46:32 PM	3:47:10 PM	master_inums_file_test_04-6-2012_verizon_fri.csv	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon Apr 09 2012	6:09:42 PM	6:10:17 PM	master_inums_file_test_04-9-2012_verz_hugh_og.csv	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Tue Apr 10 2012	1:08:11 PM	1:08:35 PM	master_inums_file_test_04-10-2012_verz_nemw_og.csv	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Wed Apr 11 2012	9:00:13 AM	9:00:37 AM	master_inums_file_test_04-11-2012_verz_hugh_og.csv	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Thu Apr 12 2012	9:00:14 AM	9:00:39 AM	master_inums_file_test_04-12-2012_verz_hugh_og.csv	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Fri Apr 13 2012	9:00:52 AM	9:01:29 AM	master_inums_file_test_04-13-2012_verz_fri.csv	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Fri Apr 13 2012	2:35:11 PM	2:35:43 PM	master_inums_file_test_04-13-2012_verz_fri.csv	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon Apr 16 2012	5:09:10 PM	5:09:29 PM	master_inums_file_test_04-16-2012_verz_hugh_og.csv	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Tue Apr 17 2012	1:13:05 PM	1:13:38 PM	master_inums_file_test_04-17-2012_verz_nemw_og.csv	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Wed Apr 18 2012	9:07:35 AM	9:08:08 AM	master_inums_file_test_04-18-2012_verz_hugh_og.csv	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Thu Apr 19 2012	9:01:01 AM	9:01:21 AM	master_inums_file_test_04-19-2012_verz_hugh_og.csv	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Fri Apr 20 2012	10:19:29 AM	10:19:48 AM	master_inums_file_test_04-20-2012_verizon.csv	2674436475 Answering Machine (Hung Up)
DCI Jacksonville	26815_Tmobile_Sprint_RPC (16)	Mary Reid	12060388	Fri Apr 20 2012	3:13:56 PM	3:14:32 PM	master_inums_file_test_04-20-2012_verizon.csv	2674436475 No Answer
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon Apr 23 2012	5:41:28 PM	5:41:45 PM	master_inums_file_test_04-23-2012_verz_hugh_og.csv	2674436474 Answering Machine (Hung Up)

DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Tue Apr 24 2012	6:03:18 PM	6:03:51 PM	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Wed Apr 25 2012	9:05:46 AM	9:06:20 AM	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Fri Apr 27 2012	9:03:30 AM	9:03:52 AM	2674436465 Hung Up in Opening
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon Apr 30 2012	9:06:29 AM	9:06:53 AM	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon Apr 30 2012	1:32:01 PM	1:32:37 PM	2674436465 No Answer
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon Apr 30 2012	7:10:06 PM	7:10:28 PM	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Tue May 01 2012	5:32:29 PM	5:32:45 PM	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26829_Verizon-Manual Blended (24)		C243	Wed May 02 2012	9:38:02 AM	9:39:02 AM	2674436474 AGENT - Unresolved
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Wed May 02 2012	9:47:49 AM	9:48:06 AM	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Wed May 02 2012	1:34:46 PM	1:35:24 PM	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Thu May 03 2012	9:03:24 AM	9:03:48 AM	2674436465 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon May 07 2012	5:59:46 PM	6:00:10 PM	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon May 07 2012	7:30:19 PM	7:30:37 PM	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	27543_Verizon-QC (22)	Mary Reid	12060388	Tue May 08 2012	7:20:21 PM	7:20:37 PM	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Thu May 10 2012	9:00:27 AM	9:00:52 AM	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Mon May 14 2012	5:24:26 PM	5:24:53 PM	2674436474 Hung Up in Opening
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Tue May 15 2012	5:12:08 PM	5:14:50 PM	2674436465 AGENT - Refused to Pay
DCI Jacksonville	26828_Verizon_IB_9044382067 (25)	Mary Reid	12060388 C156	Tue May 15 2012	5:15:45 PM	5:16:59 PM	AGENT - Customer Hung Up
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Wed May 16 2012	9:22:03 AM	9:22:18 AM	2674436467 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Thu May 17 2012	9:01:21 AM	9:01:54 AM	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26830_Verizon-RPC (21)	Mary Reid	12060388	Tue May 29 2012	7:17:54 PM	7:18:31 PM	2674436474 Answering Machine (Hung Up)
DCI Jacksonville	26828_Verizon_IB_9044382067 (25)		C286	Tue Jun 05 2012	11:51:20 AM	12:00:31 PM	AGENT - Unresolved

# EXHIBIT B



**LiveVox Scripts**  
**A\_WPC\_5**  
 Rev. 1/18/2013 11:33 AM



# EXHIBIT C



**LiveVox Scripts**  
**QC\_All\_Type**  
Rev. 2/5/2013 8:10 AM

Connected Calls

Live Person



Answering Machine Detected

**Operator Transfer**  
Please continue to  
hold...<Music>

Agent Not Available



Agent Available

**Failed Operator Transfer**

**Successful Operator Transfer**

**AM Message**  
  
Hello. Please contact <practice name> at <phone number> There is an important matter that requires your immediate personal attention. Again Please contact <practice name> at <phone number>. This call is an attempt to collect a debt and any information obtained will be used for that purpose only. Thank you  
  
1\_844#11\_058#7\_014#1\_2005#1\_875#11\_058#7\_014#1\_2006#1\_416